

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ERICA BARTMAN,

Plaintiff

v.

L'OFFICIEL USA INC., GLOBAL EMERGING  
MARKETS NORTH AMERICA INC., and  
JALOU PUBLISHING, INC. d/b/a JALOU  
MEDIA GROUP,

Defendants

21 Civ. 1987 (RA)

**NOTICE OF MOTION  
TO DISMISS THE  
COMPLAINT AND  
TO STRIKE THE JURY  
DEMAND**

**PLEASE TAKE NOTICE** that, upon the annexed Declaration of August C. Venturini, dated December 3, 2021, and all exhibits annexed thereto, the Memorandum of Law in Support, and upon all prior proceedings, pleadings and papers had or filed herein, Defendants L'Officiel USA Inc., Global Emerging Markets North America Inc., and Jalou Publishing, Inc. will move this Court, before the Honorable Ronnie Abrams, at the United States Courthouse for the Southern District of New York, at 40 Foley Square, New York, New York, Courtroom 1506, on Monday, January 24, 2022 at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order, dismissing the Complaint with prejudice, and striking the jury demand, pursuant to Federal Rules of Civil Procedure 12(b)(6) and 12(f), together with such other and further relief as to this Court may seem just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to a stipulation between the parties, opposition papers are due on January 7, 2022 and reply papers are due on January 21, 2022.

Dated: December 3, 2021  
New York, NY

VENTURINI & ASSOCIATES


By: August C. Venturini  
August C. Venturini  
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*Attorneys for Defendants*

TO:

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*Attorneys for Plaintiff*

Consistent with the Court's Individual Rules, if the parties are requesting oral argument on this motion, they must notify the Court in writing.

SO ORDERED.

  
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Hon. Ronnie Abrams  
December 27, 2021